



## INTEROFFICE MEMORANDUM

DATE: April 10, 1998  
TO: John Law, RMRS, T893A, X4842  
FROM: Lane Butler, Waste & Remediation Operations, T130C, X5245  
SUBJECT: OU7 CARBON CHANGEOUT FREQUENCY - JLB-006-98

JB

Based on review of the recent sampling data from the OU7 Seep, it is clear that we have contaminant breakthrough sometime before 2 months after carbon changeout. As I understand it, RMRS is currently changing out the carbon less frequently than 2 months. Based on this new information, the carbon must be changed out every month to ensure breakthrough is not occurring. Please make this change immediately. In addition, please ensure that operations are in strict compliance with the approved Sampling and Analysis Plan.

We recognize, as clearly demonstrated by the data, that the current treatment system is not very effective for the contaminants of concern. We also recognize that we are generating waste carbon and incurring labor and waste disposal costs. Until we receive regulatory agreement to change the treatment system we will operate the treatment system with best management practices to ensure that contaminant breakthrough is not occurring. We will set up a meeting with the regulators to discuss the data and pursue other treatment options.

It has been brought to our attention that the used carbon is considered as mixed low level waste because of radioactive contaminants in the landfill. John Schmuck indicated that we may be able to reclassify the carbon as hazardous waste only, provided sample analysis so indicated. Please review the data presented in the PAM and make recommendation regarding additional sampling or other action required to make the reclassification.

Costs for the increased carbon changeout and the sampling and analysis costs should be incurred against the existing project funding. Please provide me with a forecast of cost for the balance of the year against the existing budget so we can make a determination of additional funding requirements.

If you have questions, please call me at X5245.

cc:  
Russ Cirillo  
Steve Hahn  
Alan Rodgers  
John Schmuck

ADMIN RECORD

A-OU07-000463



FP  
Lessons  
Learned!!!

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Alan Rodgers  
John Schmuck

*Response to Lane Butler.  
BCP Costs for GAC, Roads  
Outline of Activities for  
response to schedule  
issues.*

ADMIN RECORD